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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RAMADA WORLDWIDE, INC., formerly
known as RAMADA FRANCHISE
SYSTEMS, INC., a Delaware Corporation,

Plaintiff,

v.

NORTH BECKLEY MOTEL CORP., a
West Virginia Corporation; ROBERT
MILAM, an individual; and HAROLD
MADISON, an individual,

Defendants.

Civil Action No.: 07cv7997 (LAP)

CERTIFICATION OF BRYAN P.
COUCH IN SUPPORT OF REQUEST
FOR ENTRY OF DEFAULT
PURSUANT TO FED. R. CIV. P. 55(a)

*The Clerk of the Court shall
enter default judgment of
liability against North Beckley
Motel Corp. Magistrate Judge
Breenman shall conduct an
inquest on damages.*

BRYAN P. COUCH, of full age, hereby certifies and states:

SO ORDERED

1. I am an attorney-at-law of the State of New York and an associate of the law firm of
Connell Foley LLP, attorneys for plaintiffs, Ramada Worldwide, Inc., formerly known as Ramada
Franchise Systems, Inc., a Delaware Corporation ("Plaintiff"), in the above-captioned matter. As
such, I have personal knowledge of the facts contained herein.

Laurel A. Presley
UNITED STATES DISTRICT JUDGE

March 25, 2008

2. I make this certification in support of Plaintiffs' application for the entry of default
against defendant, North Beckley Motel Corp., a West Virginia Corporation, pursuant to Federal
Rule of Civil Procedure 55(a).

3. The summons and a copy of the complaint in this action were served upon North

Beckley Motel Corp., a West Virginia Corporation, on November 15, 2007 at 110 Duncan Court, Whitesville, West Virginia 25209, as appears from the Return of Service filed with the Court. Robert Milam, an officer of the Corporation, accepted service on its behalf.

4. The time in which defendant, North Beckley Motel Corp., a West Virginia Corporation may answer or otherwise respond to the aforementioned Complaint has expired and has not been extended or enlarged by the Court, and defendant, North Beckley Motel Corp., a West Virginia Corporation, has not answered or otherwise moved.

5. Pursuant to Local Civil Rule 55.1, defendant, North Beckley Motel Corp., is a legal entity, and therefore, cannot be in the military service of the United States.

6. Accordingly, this request is being made for the entry of default against defendant, North Beckley Motel Corp., a West Virginia Corporation, in the above-captioned matter.

I certify under penalty of perjury that the foregoing is true and correct.


BRYAN P. COUCH (BC7065)

Executed on: January 25, 2008
Roseland, New Jersey